

**Schnader**  
ATTORNEYS AT LAW

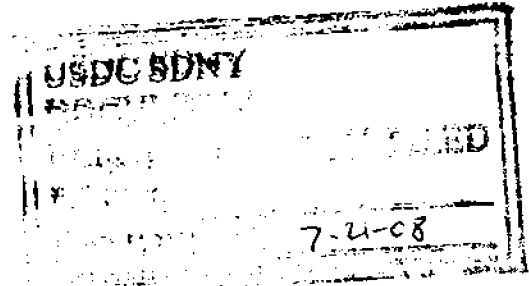
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July 15, 2008

**MEMO ENCLOSED**

**VIA FACSIMILE**  
**(212) 805-7911**

Honorable John F. Keenan  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1930  
New York, New York 10007-1312



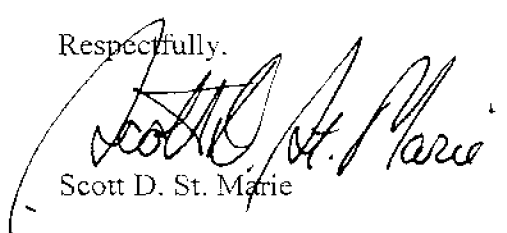
Re: Federal Insurance Company v. Turner Construction Company  
07-CV-11095 (JFK)(THK)

Dear Judge Keenan:

We represent plaintiff Federal Insurance Company ("Federal") in the above-referenced action. On June 24, 2008, The New York City Economic Development Corporation ("EDC") filed a motion to intervene as defendant and counterclaimant in this action. Federal's opposition to EDC's motion to intervene is due tomorrow, July 16, 2008. We have been in contact with counsel for EDC and are in the process of drafting a stipulation whereby Federal will consent to EDC's motion to intervene and file the proposed pleading. Counsel for EDC has advised that it may need additional time to obtain input on the stipulation, and therefore that EDC may not be able to execute the stipulation by tomorrow.

We respectfully request that the Court grant Federal until July 31, 2008 to respond to EDC's motion to intervene so that the EDC can obtain the appropriate signatures for the stipulation. All parties have agreed to the additional time for Federal to respond to EDC's motion to intervene.

Respectfully,

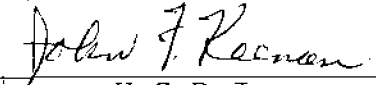
  
Scott D. St. Marie

cc: Howard M. Rosen (via email)  
Peckar & Abramson, P.C.

Steven C. Brown (via email)  
Assistant Corporation Counsel

The application is granted.

SO ORDERED.

7/21/08   
U.S.D.J.

Schnader Harrison Segal & Lewis LLP

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